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July 21, 2022

The Honorable Joanna Seybert
United States District Court Judge
100 Federal Plaza
Central Islip, New York 11722

Re: *United States v. Christian Romandetti, et al*, Case No.: 2:18-cr-00614-JS-GRB,

Unopposed Motion to Continue Sentencing for a Period of Ninety (90) Days

Your Honor:

The Defendant, Christian Romandetti, moves this Honorable Court to continue his sentencing for a period of ninety (90) days. The Government does not object to the continuance.

Mr. Romandetti is currently on pretrial supervision release and has been compliant with his conditions of release.. His sentencing is currently set for October 12, 2022. Doc. 118. The basis for the requested continuance is to allow Mr. Romandetti to continue to work on matters that could potentially mitigate his sentence. If the Court requires additional information concerning this basis, Mr. Romandetti to provide information to the Court under seal due to its sensitive nature..

The legal authority supporting the requested continuance is found in Rule 32 of the Federal Rules of Criminal Procedure and the Sixth Amendment to the United States Constitution. Rule 32 provides that a sentencing can be continued for good cause.¹ The Sixth Amendment entitles a defendant to the effective

¹ Fed. R. Crim. P. 32(b) states:

assistance of counsel at sentencing. Because of the need to develop and present mitigation evidence on behalf of Mr. Romandetti, he respectfully submits that both good cause and his right to the effective assistance of counsel support his request for a continuance. Thank you in advance for your consideration.

Sincerely,

s/ Fritz Scheller
Fritz Scheller

cc: All parties via email and ECF

TIME OF SENTENCING.

- (1) *In General*. The court must impose sentence without unnecessary delay.
- (2) *Changing Time Limits*. The court may, for good cause, change any time limits prescribed in this rule.